

EXHIBIT B

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
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Joelle Pineau

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE MATTER OF:)
RICHARD KADREY, et al.,)
Plaintiff,)
vs.) C.A. NO.:
META PLATFORMS, INC.,) 3:23-cv-03417-VC
Defendant.)
_____)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

VIDEOTAPED DEPOSITION OF JOELLE PINEAU

Montreal, Quebec, Canada

Wednesday, November 6, 2024

Stenographically Reported by:

ANGELA JANSSEN, CSR,
Commissioner of Oaths

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1 individuals.

2 Q. Did you have any responsibility
3 over the datasets that those individuals used to
4 train either the theorem proving project?

5 MS. HARTNETT: Objection to form.

6 A. I was responsible from a
7 strategic point of view and not necessarily
8 responsible for direct approvals while they were
9 not under my management chain. And then when
10 they became in my management chain, then I had
11 more oversight.

12 BY MR. YOUNG

13 Q. Do you recall approximately when
14 in 2022 they became under your management chain?

15 A. September or October, that time
16 frame.

17 Q. After September, October 2022,
18 would it be fair to say that any datasets that
19 were to be used to train any of the models at
20 FAIR -- strike that.

21 Would it be fair to say after
22 September or October 2022 when those individuals

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1 entered your management chain, that you would
2 have the ability to either approve or disapprove
3 of datasets they were considering using for
4 training AI models?

5 MS. HARTNETT: Objection to form.

6 A. The approval process for datasets
7 is a little more complicated than that. It's a
8 shared responsibility between research and
9 privacy team and our legal team.

10 BY MR. YOUNG

11 Q. But you would have input on
12 whether or not a certain dataset would be
13 approved or disapproved?

14 MS. HARTNETT: Objection to form.

15 A. So usually the research director
16 has a point of view on the content of the
17 research project; so whoever is the first line
18 research director is the approver on the research
19 plan. And the datasets are specified as part of
20 that plan.

21 And so we have a, you know
22 essentially a voice into the approval process,

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1 but all the deciders need to align so it's not a
2 singular approval.

3 BY MR. YOUNG

4 Q. Have there been any examples of
5 any datasets that you have expressed concerns
6 about using for AI training during your time at
7 Meta?

8 MS. HARTNETT: Objection to form.

9 A. I have definitely asked questions
10 about a number of datasets over time and
11 discussed this with my legal and privacy
12 partners.

13 BY MR. YOUNG

14 Q. Have you expressed concerns over
15 the use of certain datasets over any of the
16 research scientists or research managers working
17 under your direction at FAIR?

18 MS. HARTNETT: Objection to form and
19 without saying whether you've had any
20 legal discussions, if there's any
21 conversations involving legal
22 attorney-client communications, please

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1 exclude them from your answer.

2 A. It's a regular part of our job to
3 discuss the choice of datasets for the projects.
4 I do it on a weekly basis with several research
5 teams. Most of these discussions centre around
6 whether the dataset is the right one to prove our
7 scientific hypothesis.

8 My role is to uphold the bar in
9 terms of the quality of the research.

10 BY MR. YOUNG

11 Q. Has anyone expressed concerns to
12 you about use of certain datasets for AI
13 training?

14 MS. HARTNETT: Objection to form. And
15 also exclude any attorney-client
16 discussions if there were any.

17 A. What kind of concern? I mean,
18 yes. This is something we discuss on a regular
19 basis.

20 BY MR. YOUNG

21 Q. As anyone ever expressed concerns
22 to you, who's not a lawyer, about using certain

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1 A. LLaMA is just a better name.

2 Q. Not everyone at Meta agreed with
3 you though?

4 A. I'm well aware.

5 Q. Now, when LLaMA 1 was released,
6 it was released -- well, before we get to that.7 Do you recall when this lawsuit
8 was first filed against Meta?

9 MS. HARTNETT: Objection to form.

10 A. You mentioned it earlier, but I
11 don't remember exactly. Summer of 2023?

12 BY MR. YOUNG

13 Q. Do you know what the term "shadow
14 library" means?

15 A. No.

16 Q. Have you ever heard of dataset
17 known as Library Genesis or LibGen?18 A. LibGen rings a bell, but I don't
19 know the specifics.20 Q. What about Sci-Hub? Have you
21 heard of a dataset known as Sci-Hub?

22 A. Sci-Hub, no.

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1 strong characterization in terms of
2 de-duplication; what's the impact on it or not.

3 BY MR. YOUNG

4 Q. Okay.

5 A. It's more than I don't know
6 what's contained in LibGen.

7 Q. Yeah, okay.

8 Mr. Rodriguez appears to be
9 reporting about certain experiments using data
10 from GitHub or LibGen, right?

11 A. Yeah.

12 Q. And he tells you what the goal of
13 this project was, right?

14 A. Yes.

15 Q. Okay.

16 A. Where does he tell me about the
17 goal of the project? Like, in terms of the
18 specific evaluation in the table?

19 Q. That's right.

20 A. Yeah, that's like a goal of a
21 specific experiment.

22 Q. Yes. And he said the goal was:

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1 "Whether we should buy

2 licenses to use this data,"

3 correct?

4 A. Yes. That's what he says.

5 Q. Yeah. He's referring to the data
6 in GitHub and LibGen, right?

7 MS. HARTNETT: Objection to the form.

8 A. That is definitely what he's
9 referring to. I think we should, you know, take
10 his use of those terms with a grain of salt.11 He speaking as a researcher so he
12 wouldn't necessarily be the one either
13 determining how we need to or how it's done.

14 BY MR. YOUNG

15 Q. But as a researcher he can report
16 on the experiments that will guide the decision
17 makers choice whether or not to actually buy
18 licenses, right?

19 MS. HARTNETT: Objection to the form.

20 A. You definitely have a strong
21 voice in advising on what data you wish to use.

22 But as an example, I don't know

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1 what is the actual license and whether he had a
2 deep understanding of that. I don't know whether
3 we had run the analysis. That's what I mean.

4 BY MR. YOUNG

5 Q. That's right. And the next, the
6 table, right, you see the page with the table
7 bearing Bates label 63691?

8 A. Yes.

9 Q. Now, WinoGrande, HellaSwag,
10 BooIq, SIQA or PIQA, these are all benchmarks,
11 right?

12 A. Yes.

13 Q. This is like MMLU we were talking
14 about earlier?

15 A. Exactly.

16 Q. Okay. He is measuring how long
17 the -- let's back up.

18 So the experiment he ran appears
19 to be training parallel models, parallel
20 trainings, right?

21 A. Yeah.

22 Q. So parallel trainings, do you

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1 understand that to mean he trained two versions
2 of the model?

3 A. In fact, three, yeah.

4 Q. That's right. So three, three
5 versions of the model with or without certain
6 information included, right?

7 A. Exactly.

8 Q. So the top one is baseline
9 includes GitHub and LibGen, right?

10 A. Yeah.

11 Q. And next one is fiction novels
12 removed, GitHub open license only?

13 A. Yeah.

14 Q. Do you understand that to be
15 GitHub only and not LibGen?

16 MS. HARTNETT: Objection to form.

17 A. Again, so the third line excludes
18 all of LibGen and all of GitHub.

19 The line in the middle, I take
20 this to mean we excluded a portion of LibGen and
21 a portion of GitHub.

22 BY MR. YOUNG

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1 Q. Specifically fiction novels,
2 right?

3 MS. HARTNETT: Objection to the form.

4 A. Yeah.

5 BY MR. YOUNG

6 Q. Why would Aurelian exclude
7 fiction novels specifically?

8 MS. HARTNETT: Objection to the form.

9 A. That would be speculation on my
10 part at this point.

11 BY MR. YOUNG

12 Q. Do fiction novels and non-fiction
13 novels have different uses for training large
14 language models?

15 MS. HARTNETT: Objection to the form.

16 A. That depends on what you want
17 your model to do. So I think they both can or
18 can be included or not, depending on what your
19 goal is.

20 BY MR. YOUNG

21 Q. It's fair to say that fiction and
22 non-fiction have different utilities for training

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1 because I think it's just too nuanced.

2 BY MR. YOUNG

3 Q. Now, he says:

4 "We will train our models
5 only on data compatible with
6 open-sourcing," right?

7 A. Yeah.

8 Q. Okay.

9 A. That's what he says.

10 Q. Okay. Do you have an
11 understanding of what data compatible with open
12 sourcing means?

13 MS. HARTNETT: Objection to the form.

14 A. Well, the decision to open
15 source, as I explained earlier, was taken jointly
16 from the research oversight, the privacy and the
17 legal oversight.

18 So, you know, in my books, data
19 compatible with open sourcing is data that meets
20 the requirement from these three types of
21 expertise.

22 BY MR. YOUNG

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1 Q. Okay.

2 A. And I don't know that at that
3 point in the project that we had run that
4 analysis. So it wouldn't be on a researcher to
5 determine whether data is compatible with open
6 sources or not.

7 Q. But from the context of this
8 email, at least Aurelien seems to believe the
9 GitHub or LibGen is data that would not be
10 compatible open sourcing, correct?

11 MS. HARTNETT: Objection to the form.

12 A. I don't know for sure. He
13 seems -- this document suggests that some parts
14 of those datasets he thinks are not compatible
15 with open sourcing.

16 BY MR. YOUNG

17 Q. Do you know why he thought LibGen
18 was not compatible with open sourcing?

19 MS. HARTNETT: Objection to the form.

20 A. I don't know. You'd have to ask
21 him.

22 BY MR. YOUNG

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1 Q. Okay. You respond to him, right?

2 A. I do, yes.

3 Q. You add two people to the
4 conversation, right?5 A. Who did I add? Melanie and Mary,
6 yes.

7 Q. Ms. Kambadur and Ms. Williamson?

8 A. Yes.

9 Q. Who are at this time members of
10 FAIR, right?

11 A. Yes.

12 Q. You thank Aurelian and then you
13 say:14 "Great to have this analysis
15 to help guide or
16 investments", right?

17 A. Yes.

18 Q. So you are appreciative of his
19 analysis whether or not you can train data models
20 and data compatible with open sourcing, right?21 A. I'm appreciative of his analysis
22 to look at the direct impact of including certain

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1 data on the performance of the models.

2 Q. Right. You don't disagree with
3 him whether or not GitHub or LibGen are
4 compatible with open sourcing, right?

5 MS. HARTNETT: Objection to the form.

6 A. That wouldn't be my role to make
7 that determination.

8 BY MR. YOUNG

9 Q. Okay.

10 A. So at that point the question for
11 the research team is what's the research impact
12 of using certain data.

13 Q. Now, you refer to investments in
14 this message, right?

15 A. Yeah.

16 Q. Can you tell me what you meant by
17 the word "investments"?

18 A. It's hard to recall. This is
19 almost two years ago.

20 So investments could be at the
21 time there was a question of which project should
22 we invest in between the OPT successor and the

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1 Genesis project.

2 There's a question of compute
3 resource. There's a question of data resource.
4 And so, and then there's a question of whether we
5 need to license or not.

6 So all of these are part of the
7 strategy, the research strategy essentially.

8 Q. So based on the context of this
9 email, were you likely referring to investment in
10 acquiring datasets for use at Meta?

11 MS. HARTNETT: Objection to the form.

12 A. I don't know that would be part
13 of the conversation, but the question is do we
14 need the data? Do we need the storage for the
15 data?

16 Do we need -- I don't know at
17 this point if we had done the analysis on the
18 license or not. So it's even a question of,
19 like, do we ask people to run that analysis?

20 BY MR. YOUNG

21 Q. Well, would it be fair to say if
22 the data does not improve performance of the

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1 model, then why would you need to invest in
2 licensing?

3 MS. HARTNETT: Objection to the form of
4 the question.

5 A. I think it even, dialing it back,
6 I would say if the data doesn't show improvement
7 to the model, we're not even going to look into
8 whether or not this is worth considering.

9 And so license comes with certain
10 use cases. And so I think the question was
11 whether our use of it was compatible with a
12 license of it and I think the -- I don't know if
13 it's written in here likely the conclusion is
14 doesn't impact the model, therefore let's not run
15 the analysis.

16 BY MR. YOUNG

17 Q. Okay. And let's not buy the
18 license, right?

19 MS. HARTNETT: Objection to the form.

20 A. Again, I mean, that would depend
21 on what's the use case.

22 BY MR. YOUNG

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1 Q. Okay. Now you continue, right,
2 you ask him, Mr. Rodriguez, if he can comment on
3 whether or not the dataset would be useful to
4 other projects at FAIR, right?

5 A. Yes.

6 Q. And that dataset is the dataset
7 that he was conducting the experiments on, right?

8 MS. HARTNETT: Objection to the form.

9 A. Yeah, and specifically I think
10 the key part is: Do you have any thoughts on
11 what we can generalize from your results to those
12 of other cases?

13 BY MR. YOUNG

14 Q. And this is what you were talking
15 about earlier, right?

16 You were asking him about the
17 generalized use cases of this data to see whether
18 or not it would be worth the investment for Meta
19 to continue using this dataset, right?

20 MS. HARTNETT: Objection; vague.

21 A. I think it's fair to say at that
22 time I was interested to know whether those

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1 datasets were useful to training our models.

2 BY MR. YOUNG

3 Q. Because of course if they were
4 not useful, why bother examining them or
5 acquiring them in the first place?

6 MS. HARTNETT: Objection to the form of
7 the question.

8 A. If they're not useful, then we
9 shouldn't be using them. We shouldn't storing
10 them. We shouldn't be analyzing the licensing
11 properties and the business strategy around them.

12 BY MR. YOUNG

13 Q. Okay. Thank you.

14 Can you go to the very top email
15 or the last in time email from Aurelian?

16 A. Yes.

17 Q. Your first would again as
18 proprietary dataset, do you see?

19 A. Yeah.

20 Q. Oh, I'm sorry, do you know who
21 Luke Zettlemoyer is?

22 A. He's a researcher in FAIR.

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1 Q. Does he still work for FAIR?

2 A. He does.

3 Q. And he's also an academic at the
4 same time as his work at Meta, right?

5 A. Yeah.

6 Q. So he sends an email responding
7 to you, right?

8 A. Yes.

9 Q. Okay. Do you see that sentence
10 he says:11 "I don't think there's a lot
12 of strong evidence for
13 needing more long docs,"
14 right?

15 A. In Luke's email?

16 Q. Yes.

17 MS. HARTNETT: Objection; document
18 speaks for itself.

19 A. Yes. I see that.

20 BY MR. YOUNG

21 Q. Okay.

22 Does LibGen contain long form

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1 documents?

2 MS. HARTNETT: Objection to the form.

3 A. I don't know. You'd have to look
4 at it.

5 BY MR. YOUNG

6 Q. Well, Mr. Zettlemoyer is
7 responding to your question about the data,
8 right?

9 MS. HARTNETT: Objection to the form.

10 A. Yes, he's -- I mean, I'm
11 inferring that he's responding to specifically to
12 my question of whether that data would be useful
13 for other projects and Luke leads some of these
14 other projects. So he responds he doesn't think
15 there's strong evidence of needing long docs so
16 I assume that's in the context of the work that
17 he's doing.

18 BY MR. YOUNG

19 Q. Do you know if LibGen contains
20 long form documents?

21 A. I don't.

22 Q. Do you know if Meta has now

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1 decided to use LibGen to train its LLaMA models?

2 A. You mean models LLaMA 3?

3 Q. Yes.

4 A. I don't know.

5 Q. Okay. You can set this document
6 aside.

7 I'm going to start a new
8 document. I don't recall how long we've been
9 going.

10 MS. HARTNETT: We've been going for
11 about 23 minutes.

12 MR. YOUNG: Okay. I can do a short
13 document.

14 BY MR. YOUNG

15 Q. I'm going to mark as Plaintiffs'
16 504? 505, I apologize.

17 (Stenographer clarifies)

18 MS. HARTNETT: You had 503 and 503A.

19 MR. YOUNG: Yes, so 504. Madam court
20 reporter?

21 THE REPORTER: Yes.

22 MR. YOUNG: Mark as Plaintiffs' 504

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1 discuss Generative AI models with members of
2 FAIR?

3 MS. HARTNETT: Objection to the form.

4 A. I don't tend to communicate with
5 any members of FAIR through WhatsApp.

6 BY MR. YOUNG

7 Q. Okay.

8 So I want to, I'm going to mark
9 as Plaintiffs' 516 document bears Bates label
10 Meta_Kadrey_00101512.

11 (Plaintiffs' Exhibit 516:
12 Meta_Kadrey_00101512)

13 BY MR. YOUNG

14 Q. Let me know when you've had a
15 chance to look at the document?

16 A. Yeah. I'm good.

17 Q. Okay. You ready?

18 A. Yes.

19 Q. Okay. Do you recognize the
20 document that's been marked as Plaintiffs' 516?

21 A. Yes.

22 Q. Does this document appear to be a

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1 right data.

2 Same with LLaMA 5. So that was
3 really my concern to diversifying sources of data
4 in order to be able to learn the capabilities
5 that we wanted to learn.

6 BY MR. YOUNG

7 Q. Right. So data would be a block
8 for future developments of LLaMAs, right?

9 MS. HARTNETT: Objection to the form.

10 A. I mean, data is an accelerator
11 when you have the right data.

12 BY MR. YOUNG

13 Q. Right. And you say something
14 similar, right at 1:24:09 right?

15 MS. HARTNETT: Objection to the form.

16 A. Here I list different ways to go
17 about having access to data. Each of which takes
18 some effort and time to write.

19 BY MR. YOUNG

20 Q. So specifically, you list
21 collecting, curating and licensing data, right?

22 A. Yes.

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1 Q. So can you describe generally for
2 me what you mean by license or collecting data?

3 A. Collecting means going about and
4 essentially, like, recording data. It can take
5 various forms.

6 We did a lot of efforts of data
7 collection, for example, with some early
8 prototypes of Meta glasses which allows us, for
9 example, our Ego40 dataset. That gives us
10 multimodal data.

11 So there a way to collect data.
12 Sometimes we hire annotators to do machine
13 translations between languages so that is the
14 collecting piece.

15 Q. What about curating data? What
16 do you mean by curating data?

17 A. Curating is from a set of data,
18 essentially, like, selecting the subset that has
19 the highest value of data.

20 So, for example, in some cases,
21 we may have a dataset and we may not need all of
22 that data. So we need to figure out which part

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1 is valuable or not depending on the capabilities
2 that we want.

3 So an example of that may be the
4 strategy that we have for SpiderMate. We may not
5 want to blindly just collect tons of stuff but
6 you want to take some time to consider what data
7 is going to be valuable to the capabilities of
8 the model you're trying to build.

9 Q. Right because there may also be
10 risk with indiscriminately using data?

11 MS. HARTNETT: Objection to the form.

12 A. Well, the performance of the
13 model is going to be impacted by the data that is
14 used for training.

15 BY MR. YOUNG

16 Q. What do you mean by licensing
17 data?

18 A. I mean in some cases if you want
19 to enter into a license agreement with an
20 organization that has data, then it takes time to
21 figure out what are the right terms for that
22 agreement.

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1 Q. To negotiate the license terms,
2 right?

3 A. Yeah.

4 Q. Why do you refer to Katie
5 Millican here?

6 A. Katie Millican was someone that
7 we were trying to hire to lead the data strategy
8 for LLaMA.

9 Q. And Ms. Milligan at the time work
10 for Google, right?

11 A. Yes.

12 Q. Okay. You can set that document
13 aside. Thank you.

14 So I'm going to mark at
15 Plaintiffs' 517 a document produced in native
16 form as Meta Kadrey 00064715.

17 (Plaintiffs' Exhibit 517:

18 native form

19 Meta Kadrey 00064715)

20 THE WITNESS: Thank you.

21 BY MR. YOUNG

22 Q. Let's take a couple of moments to

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1

REPORTER'S CERTIFICATE

2

3 I, ANGELA JANSSEN, CSR,

4 certify;

5

6 That the foregoing proceedings were
7 taken before me at the time and place therein set
8 forth, at which time the witness was put under
9 oath by me;

10

11 That the testimony of the witness
12 and all objections made at the time of the
13 examination were recorded stenographically by me
14 and were thereafter transcribed;

15

16 That the foregoing is a true and
17 correct transcript of my shorthand notes so taken.

18

19



20

21 PER: ANGELA JANSSEN, CSR

22

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1

CERTIFICATE OF REPORTER

2

3 I, Angela Janssen, the officer before whom the
4 foregoing deposition was taken, do hereby certify
5 that the witness whose testimony appears in the
6 foregoing deposition was duly sworn by me; that
7 the Testimony of said witness was taken by me in
8 shorthand, using Computer Aided Realtime, to the
9 best of my ability and thereafter reduced to
10 written format under my direction; that I am
11 neither counsel for, related to, nor employed by
12 any of the parties to the action in which the
13 deposition was taken, and further that I am not
14 related or any employee of any attorney or counsel
15 employed by the parties thereto, nor financially
16 or otherwise interested in the outcome of the
17 action.

18



19

20 Angela Janssen, CSR

21

Chartered Shorthand Reporter

22

Commissioner of Oaths